

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

IN RE:  MIDAMERICAN ENERGY COMPANY	DOCKET NO. WRU-00-58-156
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**ORDER GRANTING, IN PART, AND DENYING,  
IN PART, REQUEST FOR WAIVER**

(Issued November 21, 2000)

On August 9, 2000, MidAmerican Energy Company (MidAmerican) filed with the Utilities Board (Board) a request for waiver of certain meter testing requirements contained in 199 IAC 20.6(2)"c" in specific circumstances. The rule requires, among other things, that an electric meter be tested for accuracy whenever it is removed from service. MidAmerican asks that this requirement be waived in two instances. First, MidAmerican requests the waiver from testing requirements whenever the removed meter is to be retired from service. Second, MidAmerican asks for waiver whenever a temporary meter installation is moved to a permanent meter installation at the same location. MidAmerican filed supplemental information in support of its waiver request on October 16, 2000. No responses to the waiver request were filed.

The Board will first address meters retired from service, which include inoperable, damaged, and obsolete meters. MidAmerican argues the costs of testing meters about to be removed from service far outweigh the benefits. MidAmerican points out that the American National Standard Code of Electricity Metering (ANSI

C12.1-1995), which the Board has adopted, allows meters to be removed without a test. MidAmerican states that its statistical meter sampling testing program, under which there is a 95 percent confidence level that less than 2.5 percent of the meters in a sample batch do not meet the Board's accuracy standards, is sufficient.

MidAmerican also proposes to hold all retired meters for 60 days before disposal in the event a customer complains of the meter's accuracy following installation of a new meter.

The Board recognizes that if a meter has been damaged to such an extent that it is inoperable, testing is impossible and a waiver will be granted. A waiver will also be granted if a damaged but still functioning meter is removed before subsequent registration on the meter could cause a measurable billing error.

However, the waiver will not be granted for damaged meters that are still operable if the meter remains in service and is used for billing purposes after the damage occurs. Under these circumstances, it is necessary to test the meter to determine the extent of the billing inaccuracy.

While the ANSI standards do not require such testing, the Board in several areas has adopted standards that exceed the ANSI standards. The Board believes there is a reason to test damaged, but still registering, electric meters if the meters were used to determine subsequent billings for usage after the damage occurred. Utility customers must be assured that they are only paying for the electricity they use.

MidAmerican also asks that obsolete meters removed from service be exempt from testing requirements. MidAmerican classifies as obsolete those older meters that do not have a useful remaining life of approximately 25 years and meter types with known accuracy problems. Based on the supplemental information filed by MidAmerican, 3 percent of these meters test outside the tolerance levels required by the Board's rules. This is a significant amount and would be cause for rejection of the entire sampled population under MidAmerican's statistical meter testing program. The Board does not believe such meters should be exempt from testing, particularly when some meters classified as obsolete are removed from service because of known accuracy problems with that model or type. MidAmerican's offer to hold damaged or obsolete meters for 60 days is not sufficient because this may not be a long enough time period for departures from past usage patterns to become apparent. The Board will not grant a waiver for meters removed due to obsolescence.

MidAmerican's second situation where a waiver is requested involves the moving of a meter from a temporary to permanent location at the same premises. For example, temporary service is established at home construction sites so power is available during construction. Upon completion, the meter is pulled from the temporary socket and placed in its permanent location at the site. The Board agrees that testing in such situations is not necessary. The rule requires testing only when the meter is "removed from service." 199 IAC 20.6(2)"c." Moving a meter from a

temporary to permanent location at the same site or premises does not constitute removal from service and a waiver of the rule is not required.

**IT IS THEREFORE ORDERED:**

1. The request for waiver of 199 IAC 20.6(2)"c" filed by MidAmerican Energy Company on August 9, 2000, and supplemented on October 16, 2000, is granted for inoperable electric meters removed from service and for damaged, but still registering, meters that are removed from service and are not used for billing of consumption that occurred after the meter was damaged.

2. MidAmerican's request for waiver is denied in all other respects. Meter testing must continue to be done pursuant to 199 IAC 20.6(2)"c" for a) damaged meters that continue to register and are used for billing of consumption after the damage occurs and b) obsolete meters.

3. Meters moved from a temporary to permanent meter location but serving the same premises need not be tested because the meter has not been removed from service as defined by 199 IAC 20.6(2)"c."

**UTILITIES BOARD**

/s/ Allan T. Thoms

/s/ Susan J. Frye

ATTEST:

/s/ Raymond K. Vawter, Jr.  
Executive Secretary

/s/ Diane Munns

Dated at Des Moines, Iowa, this 21<sup>st</sup> day of November, 2000.